

Joshua A. Sussberg, P.C.

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

601 Lexington Avenues

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)

Christopher S. Koenig

Dan Latona (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10964 (MG)
)
) (Jointly Administered)
)

**AMENDED² AGENDA FOR HEARING TO BE HELD
JUNE 28, 2023, AT 10:00 A.M. (PREVAILING EASTERN TIME)**

Time and Date of Hearing: June 28, 2023, at 10:00 a.m. (prevailing Eastern Time)

Location of Hearing: The Honorable Chief Judge Martin Glenn
United States Bankruptcy Court for the
Southern District of New York
Alexander Hamilton U.S. Custom House
One Bowling Green, Courtroom No. 523
New York, New York 10004

Hearing Attendance: In accordance with General Order M-543 (“General Order
Instructions: M-543”), dated March 20, 2020, the Hearing will take place in a
hybrid fashion both in person and via Zoom for Government. Those

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

² Amended items appear in bold.

wishing to participate in the Hearing in person may appear before the Honorable Martin Glenn, Chief United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, in Courtroom No. 523, located at One Bowling Green, New York, New York 10004-1408. Parties wishing to appear at the Hearings live or via Zoom, whether making a “live” or “listen only” appearance before the Court, need to make an electronic appearance through the Court’s website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Electronic appearances (eCourtAppearances) need to be made by **4:00 p.m. (prevailing Eastern Time) on June 27, 2023.**

Due to the large number of expected participants in the Hearing and the Court’s security requirements for participating in a Zoom for Government audio and video hearing, all persons seeking to attend the Hearing scheduled to commence at 10:00 a.m., June 28, 2023 (prevailing Eastern Time), must connect to the Hearing beginning at 9:00 a.m., June 28, 2023 (prevailing Eastern Time).

When parties sign into Zoom for Government and add their names, they must type in the first and last name that will be used to identify them at the Hearing. Parties that type in only their first name, a nickname or initials will not be admitted into the Hearing. When seeking to connect for either audio or video participation in a Zoom for Government Hearing, you will first enter a “Waiting Room,” in the order in which you seek to connect. Court personnel will admit each person to the Hearing from the Waiting Room after confirming the person’s name (and telephone number, if a telephone is used to connect) with their eCourtAppearance. Because of the large number of expected participants, you may experience a delay in the Waiting Room before you are admitted to the Hearing.

Copies of Motions:

A copy of each pleading may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Celsius>. You may also obtain copies of any pleadings by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

I. Company Status Update.

1. **Status Update.** Status Update provided by Christopher Ferraro, Interim Chief Executive Officer, Chief Restructuring Officer, and Chief Financial Officer of the Debtors.

Related Documents:

- (1) **Notice of Filing of June 28, 2023, Hearing Presentation [Docket No. 2918].**

II. Uncontested Matters.

2. **Motion to Approve Transfer of Property.** Motion to Approve the Transfer of Property Pursuant to Bankruptcy Code Section 105 and Rule 9019 of the Federal Rules of Bankruptcy Procedure [Docket No. 2758].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received: None.

Related Documents:

- (1) Amended Notice of Motion to Approve the Transfer of Property Pursuant to Bankruptcy Code Section 105 and Rule 9019 of the Federal Rules of Bankruptcy Procedure [Docket No. 2772].

Status: This matter is going forward.

3. **Motion to Authorize Foreign Representative.** Debtors' Motion for Entry of an Order (I) Authorizing Christopher Ferraro to Act as Foreign Representative and (II) Granting Related Relief [Docket No. 2802].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received: None.

Related Documents: None.

Status: This matter is going forward.

4. **Motion to Authorize Sale of Osprey BTC Shares.** Debtors' Motion Seeking Entry of an Order (I) Authorizing the Sale of Osprey BTC Shares and (II) Granting Related Relief [Docket No. 2775].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received: None.

Related Documents:

- (1) Declaration of Christopher Ferraro, Interim Chief Executive Officer, Chief Restructuring Officer, and Chief Financial Officer of the Debtors, in Support of the Debtors' Motion Seeking Entry of an Order (I) Authorizing

the Sale of Osprey BTC Shares and (II) Granting Related Relief [Docket No. 2776].

Status: This matter is going forward.

III. Contested Matters.

5. **Motion to Extend Exclusivity.** Debtors' Third Motion for Entry of an Order (I) Extending the Debtors' Exclusive Period to Solicit Acceptances of a Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 2805].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) Objection of the Ad Hoc Group of Borrowers to the Debtors' Third Motion for Entry of an Order (I) Extending the Debtors' Exclusive Period to Solicit Acceptances of a Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 2841].
- (2) Reply in Support of Debtors' Third Motion for Entry of an Order (I) Extending the Debtors' Exclusive Period to Solicit Acceptances of a Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 2900].

Related Documents:

- (1) The Official Committee of Unsecured Creditors' Statement in Support of the Debtors' Third Exclusivity Motion [Docket No. 2838].

Status: This matter is going forward.

6. **Motion to Approve Fees for Backup Plan Sponsor.** Debtors' Motion for Entry of an Order (I) Authorizing and Approving Certain Fees and Expenses for the Backup Plan Sponsor, and (II) Granting Related Relief [Docket No. 2774].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) Objection of the United States Trustee to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Certain Fees and Expenses for the Backup Plan Sponsor and (II) Granting Related Relief [Docket No. 2847].
- (2) **Reply in Support of Debtors' Motion for Entry of an Order (I) Authorizing and Approving Certain Fees and Expenses for the**

**Backup Plan Sponsor, and (II) Granting Related Relief
[Docket No. 2908].**

Related Documents:

- (1) Statement Regarding Debtors' Motion for Entry of an Order (I) Authorizing and Approving Certain Fees and Expenses for the Backup Plan Sponsor, and (II) Granting Related Relief [Docket No. 2831].
- (2) **Declaration of Samuel Schreiber, Senior Director of Alvarez & Marsal North America, LLC, in Support of the Debtors' Motion for Entry of an Order (I) Authorizing and Approving Certain Fees and Expenses for the Backup Plan Sponsor, and (II) Granting Related Relief [Docket No. 2909].**

Status: This matter is going forward.

7. **Euclid Motion for Relief from Automatic Stay.** Motion of Euclid Financial Institution Underwriters, LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company for Relief from the Automatic Stay to the Extent Applicable [Docket No. 2585].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) The Official Committee of Unsecured Creditors' Limited Objection to Euclid Financial Institution Underwriters, [sic] LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company for Relief from the Automatic Stay to the Extent Applicable and Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D & O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2839].
- (2) Debtors' Limited Objection and Reservation of Rights Regarding Euclid Financial Institution Underwriters, LLC's Motion for Relief from the Automatic Stay [Docket No. 2842].
- (3) Víctor Ubierna De Las Heras' Omnibus Objection to Motion of Euclid Financial Institution Underwriters, LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company for Relief from the Automatic Stay to the Extent Applicable and to Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D & O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2849].

- (4) Reply of Euclid Financial Institution Underwriters, LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company in Support of Its Motion for Relief from the Automatic Stay to the Extent Applicable [Docket No. 2859].
- (5) Reply of Shlomi Daniel Leon and Aliza Landes in Further Support of Motion for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D & O Insurance [Docket No. 2873].

Related Documents:

- (1) Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D&O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2760].
- (2) Notice of Filing of Exhibit A to the Debtors' Limited Objection and Reservation of Rights Regarding Euclid Financial Institution Underwriters, LLC's Motion for Relief from the Automatic Stay [Docket No. 2851].

Status: This matter is going forward.

- 8. **Leon and Landes Motion for Relief from Stay.** Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D&O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2760].

Objection Deadline: June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) The Official Committee of Unsecured Creditors' Limited Objection to Euclid Financial Institution Underwriters, [sic] LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company for Relief from the Automatic Stay to the Extent Applicable and Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D & O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2839].
- (2) Debtors' Limited Objection and Reservation of Rights Regarding Euclid Financial Institution Underwriters, LLC's Motion for Relief from the Automatic Stay [Docket No. 2842].
- (3) Víctor Ubierna De Las Heras' Omnibus Objection to Motion of Euclid Financial Institution Underwriters, LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company for Relief from the Automatic Stay to the Extent

Applicable and to Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D & O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2849].

- (4) Reply of Euclid Financial Institution Underwriters, LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company in Support of Its Motion for Relief from the Automatic Stay to the Extent Applicable [Docket No. 2859].
- (5) Reply of Shlomi Daniel Leon and Aliza Landes in Further Support of Motion for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D & O Insurance [Docket No. 2873].

Related Documents:

- (1) Motion of Euclid Financial Institution Underwriters, LLC, a Duly Authorized Agent of Certain Underwriters at Lloyds of London and Republic Vanguard Insurance Company for Relief from the Automatic Stay to the Extent Applicable [Docket No. 2585].
- (2) Notice of Hearing on Motion of Shlomi Daniel Leon and Aliza Landes for Relief from the Automatic Stay, as Applicable, to Permit Payments Under D&O Insurance and Joinder in Insurers' Motion Seeking the Same Relief [Docket No. 2763].

Status: This matter is going forward.

- 9. **Caceres Motion for Valuation of CEL Token.** Santos Caceres' Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2169].

Objection Deadline: The initial objection deadline was March 18, 2023, at 10:00 a.m. (prevailing Eastern Time). The objection deadline was extended to May 14, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was extended a second time for the Debtors and the Official Committee of Unsecured Creditors to June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) The Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2840].
- (2) Debtors' Joinder in Support of the Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize

Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2846].

- (3) Sean StJohn's Reply to the Official Committee of Unsecured Creditors' Omnibus Objection to Motion for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2867].
- (4) Santos Caceres' Reply to the Official Committee of Unsecured Creditors' Omnibus Objection to Motion for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2869].

Related Documents:

- (1) Santos Caceres' Amended Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2208].
- (2) Amended Notice of Hearing on Santos Caceres' Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2215].
- (3) Santos Caceres' Second Amended Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2240].
- (4) Amended Notice of Hearing on Santos Caceres' Second Amended Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2241].
- (5) Order Adjourning the Motion of Santos Caceres [Docket No. 2260].
- (6) Amended Notice of Hearing on Santos Caceres' Second Amended Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2329].
- (7) Notice of Adjournment [Docket No. 2583].

- (8) Letter Request to Extend Deadline to Object for the Official Committee of Unsecured Creditors [Docket No. 2593].
- (9) Letter Request to Extend Deadline to Object for the Debtors [Docket No. 2601].
- (10) Memorandum Endorsed Order Granting Letter Request to Extend Deadline to Object [Docket No. 2610].
- (11) Declaration of Aaron Colodny in Support of the Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2844].
- (12) Declaration of Maxwell Galka in Support of the Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2845].
- (13) The Official Committee of Unsecured Creditors' *Ex Parte* Motion to Redact and File Under Seal Certain Confidential Discovery Material Submitted in Connection with the Committee's CEL Token Valuation Objection [Docket No. 2848].
- (14) **Letter to Judge Glenn re Motion by Santos Caceres [Docket No. 2906].**

Status: This matter is going forward.

10. **StJohn Motion for Valuation of CEL Token.** Sean StJohn's Motion for Entry of an Order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2216].

Objection Deadline: The initial objection deadline was May 14, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was extended for the Debtors and the Official Committee of Unsecured Creditors to June 21, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) The Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2840].
- (2) Debtors' Joinder in Support of the Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize

Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2846].

- (3) Sean StJohn's Reply to the Official Committee of Unsecured Creditors' Omnibus Objection to Motion for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2867].
- (4) Santos Caceres' Reply to the Official Committee of Unsecured Creditors' Omnibus Objection to Motion for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2869].

Related Documents:

- (1) Notice of Hearing on Sean StJohn's Motion for Entry of an order (I) to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565; if Otherwise, (II) Request the Debtors to Submit Evidence Supporting Inequitable Treatment of Unsecured Creditors in the Earn Group (III) Granting Related Relief [Docket No. 2327].
- (2) Notice of Adjournment [Docket No. 2584].
- (3) Letter Request to Extend Deadline to Object for the Official Committee of Unsecured Creditors [Docket No. 2593].
- (4) Letter Request to Extend Deadline to Object for the Debtors [Docket No. 2601].
- (5) Memorandum Endorsed Order Granting Letter Request to Extend Deadline to Object [Docket No. 2610].
- (6) Declaration of Aaron Colodny in Support of the Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2844].
- (7) Declaration of Maxwell Galka in Support of the Official Committee of Unsecured Creditors' Omnibus Objection to Motions for Entry of an Order to Dollarize Non-Insider CEL Token Claims at the Petition Date Price of \$0.81565 [Docket No. 2845].
- (8) The Official Committee of Unsecured Creditors' *Ex Parte* Motion to Redact and File Under Seal Certain Confidential Discovery Material Submitted in Connection with the Committee's CEL Token Valuation Objection [Docket No. 2848].

Status: This matter is going forward.

11. **Fee Examiner Fee Application.** First Interim Application of DelawareADR, LLC as Court-Appointed Independent Fee Examiner, for Allowance of Compensation for Services and Reimbursement of Expenses for the Period from October 13, 2022 Through February 28, 2023 [Docket No. 2622].

Objection Deadline: June 1, 2023, at 12:00 p.m. (prevailing Eastern Time).

Responses Received: None.

Related Documents:

- (1) Notice of Filing First Interim Fee Applications of DelawareADR, LLC and Godfrey & Kahn, S.C. [Docket No. 2624].

Status: This matter is going forward.

12. **Fee Examiner Counsel Fee Application.** First Interim Application of Godfrey & Kahn, S.C., as Attorneys for the Fee Examiner, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from October 13, 2022–February 28, 2023 [Docket No. 2623].

Objection Deadline: June 1, 2023, at 12:00 p.m. (prevailing Eastern Time).

Responses Received: None.

Related Documents:

- (1) Notice of Filing First Interim Fee Applications of DelawareADR, LLC and Godfrey & Kahn, S.C. [Docket No. 2624].

Status: This matter is going forward.

IV. Status Conferences.

13. **Christopher Lee Shanks v. Celsius Network LLC, et al.** (Adv. Proc. No. 23-01010). Status Conference.

Related Documents:

- (1) Complaint for Declaratory Judgment [Docket No. 1].
(2) Amended Complaint for Declaratory Judgment [Docket No. 4].
(3) Summons with Notice of Pre-Trial Conference [Docket No. 5].
(4) Letter Request for Subsequent Summons [Docket No. 6].
(5) Second Summons and Notice of Pre-Trial Conference [Docket No. 7].

- (6) Debtors' Motion to Dismiss the Amended Complaint and Incorporated Memorandum of Law [Docket No. 9].
- (7) Notice of Adjournment [Docket No. 11].
- (8) Notice of Status Conference on Debtors' Motion to Dismiss the Amended Complaint [Docket No. 12].

Status: This matter is going forward.

14. **Georgiou, et al. v. Celsius Network LLC, et al. (Adv. Proc. No. 23-01016).** Pre-Trial Conference.

Related Documents:

- (1) Complaint [Docket No. 1].
- (2) Summons with Notice of Pre-Trial Conference [Docket No. 2].
- (3) Stipulation Extending Debtors' Time to Answer [Docket No. 3].
- (4) Notice of Adjournment [Docket No. 2431].
- (5) Notice of Adjournment [Docket No. 4].
- (6) Joint Stipulation and Agreed Order by and Among the Debtors and Plaintiffs [Docket No. 5].
- (7) Joint Stipulation and Agreed Order by and Among the Debtors and Plaintiffs Signed on 5/3/2023 [Docket No. 6].
- (8) Notice of Adjournment [Docket No. 8].
- (9) Debtors' Motion to Dismiss the Complaint and Incorporated Memorandum of Law [Docket No. 9].
- (10) Plaintiffs' Opposition to Defendants' Motion to Dismiss [Docket No. 12].
- (11) Debtors' Reply in Support of Debtors' Motion to Dismiss the Complaint and Incorporated Memorandum of Law [Docket No. 13].

Status: This matter is going forward.

15. **Ad Hoc Group of Borrowers v. Celsius Network LLC, et al. (Adv. Proc. No. 23-01007).** Pre-Trial Conference.

Related Documents:

- (1) Complaint [Docket No. 1].

- (2) Summons with Notice of Pre-Trial Conference [Docket No. 2].
- (3) Notice of Status Conference [Docket No. 3].

Status: This matter is going forward.

16. **Official Committee of Unsecured Creditors v. Celsius Network Limited (Adv. Proc. No. 23-01104).** Pre-Trial Conference.

Related Documents:

- (1) Complaint [Docket No. 1].
- (2) Summons with Notice of Pre-Trial Conference [Docket No. 2].
- (3) Notice of Presentment of the Stipulation and Agreed Order Between the Official Committee of Unsecured Creditors and the Debtors with Respect to Certain Deadlines [Docket No. 3].
- (4) Stipulation and Agreed Order Between the Official Committee of Unsecured Creditors and the Debtors with Respect to Certain Deadlines [Docket No. 5].

Status: This matter is going forward.

V. **Adjourned Matters.**

17. **Fred Shanks v. Celsius Network LLC, et al. (Adv. Proc. No. 22-01190).** Status Conference.

Related Documents:

- (1) Debtors' Motion to Dismiss the Amended Complaint and Incorporated Memorandum of Law [Docket No. 17].
- (2) Objection on Debtors' Motion to Dismiss of Claim No. 22-01190 of Fred M. Shanks [Docket No. 18].
- (3) Notice of Adjournment [Docket No. 19].
- (4) Amended Complaint [Docket No. 21].
- (5) Notice of Adjournment [Docket No. 22].
- (6) Joint Stipulation and Agreed Order by and Among the Debtors and Fred M. Shanks Setting Briefing Schedule [Docket No. 25].

Status: This matter has been adjourned to July 18, 2023, at 10:00 a.m. (prevailing Eastern Time).

18. **Key Employee Incentive Plan.** Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Docket No. 2336].

Objection Deadline: The initial objection deadline was April 11, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was extended for the U.S. Trustee to April 14, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was also extended for the Official Committee of Unsecured Creditors to May 10, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was extended again for the Official Committee of Unsecured Creditors to July 26, 2023, at 4:00 p.m. (prevailing Eastern Time) at the direction of the Court.

Responses Received:

- (1) Objection to the Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Docket No. 2408].
- (2) Víctor Ubierna de las Heras Objection to Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Program and (II) Granting Related Relief (Dk. 2336) [Docket No. 2409].
- (3) Objection to the Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Docket No. 2410].
- (4) Objection to the Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Docket No. 2411].
- (5) Objection of the United States Trustee to Motion of Debtors for Entry of Order Approving Debtors' Key Employee Incentive Plan [Docket No. 2430].
- (6) Supplemental Statement Regarding the Debtors' So-Called "KEIP" (That Is Really a KERP) and Joinder to the United States Trustee's Objection and Other Objections to the Same [Docket No. 2481].

Related Documents:

- (1) Declaration of Allison Hoeinghaus in Support of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Plan and (II) Granting Related Relief [Docket No. 2337].
- (2) Letter Request re Extension of Deadline to Object to Debtors' KEIP Motion [Docket No. 2340].

- (3) Memorandum Endorsed Order Granting Letter Request re Extension of Deadline to Object to Debtors' KEIP Motion [Docket No. 2343].
- (4) Notice of Status Conference Regarding the Debtors' Motion for Entry of an Order (I) Approving the Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Docket No. 2397].
- (5) Letter Request re Extension of Deadline to Object to Debtors' KEIP Motion [Docket No. 2401].
- (6) Memorandum Endorsed Order Granting Letter Request re Extension of Deadline to Object to Debtors' KEIP Motion [Docket No. 2404].
- (7) Letter Request to Extend Deadline to Object to Key Employee Incentive Plan [Docket No. 2613].
- (8) Notice of Adjournment [Docket No. 2614].
- (9) Memorandum Endorsed Order Granting Letter Request re Extension of Deadline to Object to Debtors' KEIP Motion [Docket No. 2618].
- (10) Notice of Adjournment [Docket No. 2832].

Status: This matter has been adjourned to August 2, 2023, at 10:00 a.m. (prevailing Eastern Time).

19. **Willis Towers Watson Retention Application.** Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Willis Towers Watson US LLC as Compensation Consultant, Effective as of July 13, 2022, and (II) Granting Related Relief [Docket No. 2726].

Objection Deadline: The initial objection deadline was June 21, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was extended for the U.S. Trustee to July 11, 2023, at 4:00 p.m. (prevailing Eastern Time) by agreement of the parties.

Responses Received: None.

Related Documents:

- (1) United States Trustee's Motion for Order Directing Disgorgement of All Estate Funds Paid to Willis Towers Watson [Docket No. 2640].
- (2) Notice of Adjournment [Docket No. 2850].

Status: This matter has been adjourned to July 18, 2023, at 10:00 a.m. (prevailing Eastern Time).

20. **Motion for Disgorgement of Fees.** United States Trustee's Motion for Order Directing Disgorgement of All Estate Funds Paid to Willis Towers Watson [Docket No. 2640].

Objection Deadline: The initial objection deadline was June 21, 2023, at 4:00 p.m. (prevailing Eastern Time). The objection deadline was extended for the U.S. Trustee to July 11, 2023, at 4:00 p.m. (prevailing Eastern Time) by agreement of the parties.

Responses Received: None.

Related Documents:

- (1) Notice of Adjournment [Docket No. 2850].

Status: This matter has been adjourned to July 18, 2023, at 10:00 a.m. (prevailing Eastern Time).

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New York, New York
Dated: June 27, 2023

/s/ Joshua A. Sussberg

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C.

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: joshua.sussberg@kirkland.com

- and -

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)

Christopher S. Koenig

Dan Latona (admitted *pro hac vice*)

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: patrick.nash@kirkland.com

ross.kwasteniet@kirkland.com

chris.koenig@kirkland.com

dan.latona@kirkland.com

Counsel to the Debtors and Debtors in Possession